Ethyl_® Corporation Houston Plant

Please Address Reply To: P.O. Box 472 Pasadena, TX 77501-0472

January 19, 2011

<u>CERTIFIED MAIL - RETURN RECEIPT REQUESTED</u> Article No. 7010 0290 0001 0097 1016

US Environmental Protection Agency Ariel Rios Building MC-2222A 1200 Pennsylvania Avenue, NW Washington, D.C. 20460

Attn: Import-Export Program, Robert G. Heiss, Director

Re: Annual Hazardous Waste Exporter Report

Dear Mr. Heiss:

The Ethyl Corporation - Houston Plant's Annual Report for exported hazardous waste during the year 2010 is listed below which conforms to information requirements outlined in 40CFR262.56 and 262.87(a).

1. Exporter Identification:

EPA ID # TXD008096158 Ethyl Corporation - Houston Plant 1000 N South Street P.O. Box 472 Pasadena, TX 77501-0472

2. Calendar year covered:

2010

3. Name and site address of consignee:

Clean Harbors Canada, Inc. (Former Safety-Kleen Environmental Services, Ltd.) 551 Avonhead Road Mississauga, Ontario L5J 4B1 Canada

4. Details on Waste:

Description	Waste Motor Fuel Antiknock	Waste Motor Fuel Antiknock
1	Mixtures (Tetraethyl lead)	Mixtures (Tetraethyl lead)
EPA Hazardous Waste #	D008, D028, P110	D001, D008, D028 P110
DOT Hazard Class	6.1, UN1649, I	6.1, UN1649, I
Transporter Name and EPA	Clean Harbors Canada, Inc.	Clean Harbors Canada, Inc.
ID#	SCD987574647 &	SCD987574647 &
	MIT270019904	MIT270019904
Total Amount Shipped	114,340	74,660
Pounds		
Number of Shipments	5	2

5. Waste Minimization and Toxicity Reduction Programs

The waste is generated from the periodic clean-outs of tanks and containers used in the terminal operations and transportation of antiknock fuel mixtures. Ethyl Corporation ceased the production of TEL at the Houston Plant in 1980. Clean-out wastes were not exported from the Houston plant for treatment and disposal prior to 1998. Waste volume is expected to trend towards zero over a period of ten years or more as worldwide sales of TEL based antiknock fuel additives continue to decline.

6. Certification:

I certify under penalty of law that I personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

If you have any questions on this matter, please contact me at 713-740-8371.

Sincerely,

ETHYL CORPORATION

H Steven Livesay

H. Steven Livesay

Sr. Manager HSSE



